

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00103-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF KRISTOPHER DAVIS IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S SUR-REPLY TO SAMSUNG'S
OPPOSED MOTION FOR LEAVE TO SERVE A SUPPLEMENTAL REBUTTAL
REPORT ADDRESSING HEADWATER DAMAGES OPINIONS (DKT. 317)**

I, Kristopher Davis, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's Sur-Reply to Samsung's Opposed Motion for Leave to Serve a Supplemental Rebuttal Report Addressing Headwater Damages Opinions. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Numbered exhibits were previously submitted with Samsung's motion (Dkt. 317) or reply (Dkt. 340).

3. Lettered exhibits A-I were previously submitted with Headwater's opposition (Dkt. 330).

4. Attached as Exhibit J is a true and correct copy of excerpts from Samsung Defendants' Second Set of Interrogatories to Headwater Research LLC (Nos. 14-22) in *Headwater Research LLC v. Samsung Elecs. Co. Ltd.*, No. 2:23-00641-JRG-RSP (E.D. Tex.), dated January 27, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 4, 2025, at Los Angeles, California.

/s/ Kristopher Davis
Kristopher Davis

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2025, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3).

/s/ Kristopher Davis
Kristopher Davis